

### **REMARKS**

In the Office Action, the Examiner rejected Claims 1-15, which are all of the pending claims, under 35 U.S.C. §102(b) based upon an alleged public use or sale. To document this alleged public use or sale, the Examiner cited a document "Using the FT Development environment: chapters 1-9, Appendix A (referred to as Environ). In addition, the Examiner objected to the Title of the application as not descriptive, and to the Abstract.

Applicants are herein amending independent claims 1, 6 and 11 to better define the subject matter of these claims. Also, the Title and the Abstract are being amended to address the Examiner' objections.

More specifically, the Title is being changed to: "Method and System for Providing a Flexible Infrastructure for Managing a Process," which is more descriptive of ht claimed subject matter. Further, the Abstract is being amended, as the Examiner asked, to delete the terms method and system.

In view of these changes, the Examiner is requested to reconsider and to withdraw the objections to the Title and the Abstract.

With respect to the rejection of the claims under 35 U.S.C. §102, Applicants note that Environ does not show that the present invention was on sale or in public use more than one year before the filing date of this application. Nonetheless, the differences between this invention and the subject matter disclosed in this reference will be discussed.

The present invention involves describing workflow types and coding subforms and data keywords for the defined workflow type, defining and customizing role documents, and building process flow documents for the defined workflow type. All of these area, working together,

allow users to define, generate and deploy at a low cost application defined workflows and their related components. This is done by running a set of agents that generate files that map the application defined workflow into actions that can be called and executed within the cope of the architecture of this invention.

The preferred embodiment of this invention is a web based architecture that supports the definition and execution of any predefined set of application activities. Activities are defined in terms of workflow, mapped to a specifics set of supported tags and generated into an executable set of application web pages. The generated application pages, combined with the application specific data, are used to form the proper sequence of approvals and other steps involved to build and present that application's workflow pages upon request.

In other Workflow Management Systems (WFMS), including the system shown in Environ, event mechanisms or triggers manage the workflow through some kind of input and output containers. Event programs then move the data between containers or across networks to other defined WFMS containers where other event programs act on and process data as defined by some set of WFMS defined events. In many of these WFMS systems, the workflow is built into forms that are routed to other network servers and/or clients, requiring complex systems to manage event activity.

With the preferred embodiment of this invention, in contrast, all application defined workflow pages and data may be managed and processed realtime, on request. It is not necessary to build and route forms or to map data and process models into containers, where events then occur against them. No use of circulation control functions for carrying out branching, queuing, dividing, broadcasting, recovering, holding and substitution of circulation materials is required.

The present invention does not need to implement routing paths of documents from person to person or group to group, and this invention does not need to define specific sets of data to be clustered in any given sequence of events.

Independent Claims 1, 6 and 11 are being amended to emphasize differences between the claims and the prior art. Specifically, claims 1 and 11 are being amended to set forth the steps of displaying the subforms to application users; and running a set of agents to generate files that map application defined workflows into pages and actions that can be called and executed. Analogous apparatus limitations are being added to Claim 6. These features, which are not shown or suggested in Environ, in combination with the other elements of the claims enable the invention to achieve a high degree of flexibility, at low cost.

The other references of record have been reviewed, and they are not believed to be any more pertinent than Environ. In particular, these other references, whether considered individually or in combination, also fail to teach or suggest the of the above-discussed use of the agents, in the above-described manner, to generate files that map the application defined workflow into pages and actions that can be called and executed.

Because of the above-discussed differences between Claims 1, 6 and 11, and because of the advantages associated with those differences, these claims patentably distinguish over the prior art and are allowable. Claims 2-5 are dependent from Claim 1 and are allowable therewith; and claims 7-10 are dependent from, and are allowable with, Claim 6. Similarly, Claims 12-15 are dependent from Claim 11 and are allowable therewith. Accordingly, the Examiner is respectfully requested to reconsider and to withdraw the rejection of Claims 1-15 under 35 U.S.C. §102, and to allow these claims.

For the reasons set forth above, the Examiner is asked to reconsider and to withdraw the objections to the Title and the Abstract, to reconsider and to withdraw the rejection of Claims 1-15, and to allow these claims. If the Examiner believes that a telephone conference with Applicants' Attorneys would be advantageous to the disposition of this case, the Examiner is asked to telephone the undersigned.

Respectfully submitted,

*John S. Sensny*  
John S. Sensny  
Registration No. 28,757

SCULLY, SCOTT, MURPHY & PRESSER  
400 Garden City Plaza  
Garden City, New York 11530  
(516) 742-4343

JSS:gc